

EXHIBIT 1
REDACTED VERSION OF
DOCUMENT FILED
UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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WAYMO LLC,

Plaintiff,

vs.

No. 3:17-cv-00939-WHA

UBER TECHNOLOGIES, INC.;

OTTOMOTTO LLC; OTTO TRUCKING,
INC.,

Defendants.

_____/

HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY

VIDEOTAPED DEPOSITION OF DMITRI DOLGOV

PALO ALTO, CALIFORNIA

TUESDAY, AUGUST 8, 2017

BY: ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~

CSR LICENSE NO. 9830

JOB NO. 2664656

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Videotaped Deposition of Dmitri Dolgov,
taken on behalf of the Defendants, on August 8,
2017, at Morrison & Foerster LLP, 950 Page Mill
Road, Palo Alto, California, beginning 2:11 p.m.,
and commencing at 6:00 p.m., Pursuant to Notice,
and before me, ANDREA M. IGNACIO, CSR, RPR, CRR,
CLR ~ License No. 9830.

1	A	I'm not aware of that.	17:49
2	MR. LIN:	Okay. That's all I have.	17:49
3	MR. JAFFE:	So I -- I have some brief	17:49
4		questions. I can do it from this seat, or we can --	17:49
5		we can trade spots. Up to you guys. I don't care.	17:49
6	MR. LLEWELLYN:	I'm fine with you doing it	17:49
7		from there.	17:49
8	MR. JAFFE:	Okay.	17:49
9			17:49
0		EXAMINATION	17:49
1	BY MR. JAFFE:		17:49
2	Q	Dr. Dolgov, I'm -- I'm going to make this go	17:49
3		as quickly as humanly possible.	17:49
4		Can you please grab 1360 from your stack.	17:49
5	A	(Witness complies.)	17:49
6	Q	It's the e-mail thread with the subject line:	17:49
7		"Laser/camera thoughts."	17:50
8	A	Yeah.	17:50
9	Q	So I want to take you to the e-mail at the --	17:50
0		at the bottom of the page, dated June 19, 2015.	17:50
1		Do you see that?	17:50
2	A	I do.	17:50
3	Q	Okay. What was your position on the	17:50
4		self-driving project as of June 15, 2015?	17:50
5	A	I led the software team.	17:50

1 Q Okay. So in your e-mail, it says: 17:50
2 "Bryan, we just had [REDACTED] [REDACTED]
3 [REDACTED]."
4 Do you see that? 17:50
5 A I do. 17:50
6 Q As the head of the software team, why were 17:50
7 you doing [REDACTED]? 17:50
8 [REDACTED] [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED]
16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 Q Do you remember an MBr LiDAR device? 17:51
23 A I do. 17:51
24 Q Okay. Do you know what -- what it stands 17:51
25 for? 17:51

1 A I think Mama Bear. 17:51

2 Q Did Waymo, or Project Chauffeur before that, 17:51

3 [REDACTED] [REDACTED]

4 [REDACTED] [REDACTED]

5 [REDACTED] [REDACTED]

6 [REDACTED] [REDACTED]

7 [REDACTED] [REDACTED]

8 [REDACTED] [REDACTED]

9 [REDACTED] [REDACTED]

10 [REDACTED] [REDACTED]

11 [REDACTED] [REDACTED]

12 [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED] 17:52

20 Q And what was your role personally in that -- 17:52

21 in those discussions? 17:52

22 A I'm not sure I can recall those directly. I 17:53

23 think those were in pretty early days of the team. I 17:53

24 think, at that time, I worked or maybe led the effort 17:53

25 that was focused on planning at -- maybe at that point 17:53

1 I led the on-board software team. 17:53

2 But regardless of that role, I think I was 17:53

3 one of the experienced -- more experienced software 17:53

4 engineers on the team. 17:53

5 So, I was involved in kind of the discussions 17:53

6 [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

20 Q Okay. So going back to 1360. 17:54

21 Actually, before we get there, if you can 17:54

22 look at 1361. 17:54

23 A (Witness complies.) 17:54

24 Got it. 17:55

25 Q So in the -- in the middle e-mail here, there 17:55

1 is a -- there is a list of items the follow-on actions 17:55

2 are. 17:55

3 Do you see that? 17:55

4 A I do. 17:55

5 Q And No. 2 says: 17:55

6 [REDACTED] [REDACTED]

7 [REDACTED] [REDACTED]

8 Do you see that? 17:55

9 A I do. 17:55

10 Q What does [REDACTED] refer to here? 17:55

11 A I -- my understanding is that this is a 17:55

12 [REDACTED] [REDACTED]

13 [REDACTED] [REDACTED]

14 [REDACTED] [REDACTED]

15 [REDACTED] [REDACTED]

16 [REDACTED] [REDACTED]

17 [REDACTED] [REDACTED]

18 [REDACTED] [REDACTED]

19 [REDACTED] [REDACTED]

20 [REDACTED] [REDACTED]

21 MR. JAFFE: All right. 17:56

22 Let's mark this next document as 602. And 17:56

23 it's a big piece of paper, so hat's off to the -- the 17:56

24 file room for printing this off. 17:56

25 MR. LLEWELLYN: Counsel, I just want to 17:56

1 clarify. Do you think this redirect is responsive to 17:56
2 something that was raised in the course of his 17:56
3 deposition? 17:56

4 MR. JAFFE: Yep. 17:56

5 (Document marked Exhibit 602 17:56
6 for identification.) 17:56

7 MR. JAFFE: Dr. Dolgov, I've marked as 17:56
8 Exhibit 602. 17:56

9 Q Are these [REDACTED] that were 17:56
10 referred -- that you just referred to? 17:56

11 A I can't be exactly confident, but that 17:57
12 mention in the e-mail looks like it has a link. I 17:57
13 can't be, you know, confident. I can't know for sure 17:57
14 if it links to that document, that spreadsheet. But 17:57
15 the spirit of it, as I described it, is -- is -- is 17:57
16 accurate, yeah. 17:57

17 Q Okay. So, in just looking at the information 17:57
18 on the left-hand side, in the left-hand-most column, 17:57
19 [REDACTED] where did these 17:57
20 entries in the leftmost column come from? 17:57

21 MR. LLEWELLYN: So Counsel, I'm going to 17:57
22 object to all of this as beyond the scope of proper 17:57
23 redirect. 17:57

24 MR. JAFFE: Q. Go ahead. 17:57

25 [REDACTED] 17:57

1 [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED] 17:58
5 Q Is the information in this document, such as 17:58
6 in the left-hand corner, is -- is this kept -- kept 17:58
7 confidential within Waymo? 17:58
8 A I would expect so. I mean, by default, 17:58
9 everything that we have to do, especially things that 17:58
10 are essence as the -- [REDACTED] [REDACTED]
[REDACTED] are kept confidential. 17:58
12 Q And why are the -- [REDACTED] [REDACTED]
[REDACTED] -- why is that in particular 17:58
14 sensitive? 17:58
15 A Oh, this is, in a way, a product of the 17:58
16 experience that the team has accumulated over the 17:58
17 years of working on this technology, understanding, 17:58
18 you know, [REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED] 17:59
23 Q Would Waymo share the information in 17:59
24 Exhibit 602 with a competitor? 17:59
25 A Not unless there were really good reasons to 17:59

1 do so. 17:59

2 Q And do you have any personal knowledge 17:59

3 regarding the value of -- of this information to Waymo 17:59

4 in the self-driving car project? 17:59

5 A I can't -- I'm not sure if I can quantify the 17:59

6 value. But it -- as I just mentioned, it's -- in my 17:59

7 mind, the value is tremendous because it captures the 17:59

8 experience accumulated over the course of developing 17:59

9 the system and trying different ideas and 18:00

10 understanding, you know, [REDACTED] [REDACTED]

[REDACTED] [REDACTED] [REDACTED]

[REDACTED] [REDACTED] 18:00

13 Q And, to your knowledge, is the information 18:00

14 contained in this document, Exhibit 602 -- does it 18:00

15 reflect -- is it in the public domain? 18:00

16 A Not that I'm aware of. 18:00

17 Q Okay. 18:00

18 MR. JAFFE: All right. No further questions. 18:00

19 MR. LLEWELLYN: I have a further question. 18:00

20 18:00

21 FURTHER EXAMINATION 18:00

22 BY MR. LLEWELLYN: 18:00

23 Q You testified that you couldn't be sure 18:00

24 whether this newly marked exhibit was, in fact, the 18:00

25 [REDACTED] that were specifically called out in 18:00